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November 16, 2012

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554

Re: Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; Developing a Unified Intercarrier Compensation Regime; WC Docket Nos. 10-90, 07-135, CC Docket Nos. 01-92

Dear Ms. Dortch:

On November 15th, Christi Shewman, Kim Meola, Penn Pfautz and I, on behalf of AT&T, met via telephone with William Dever, Carol Simpson, Richard Hovey, and Steve Rowings of the Wireline Competition Bureau, Chris Killion, Terry Cavanaugh, Margaret Dailey and Theodore Marcus of the Enforcement Bureau and John Healy of the Public Safety Bureau. At the request of staff, we discussed issues related to the wholesale market for alternative transport providers and AT&T's practices as it relates to those carriers. AT&T noted that there are a limited number of alternative providers that can meet its minimum standards for termination of customer traffic. These standards include: no looping (can't send traffic back to AT&T services – directly or indirectly), no actions to make traffic appear as other than US-originated long distance traffic, no alteration of CPN or other signaling parameters, no attempt to avoid access claiming TDM as "enhanced," and compliance with all applicable laws. In addition, the vendor must similarly bind any of its suppliers. These standards help to ensure that customer traffic is terminated reliably, consistently and without arbitrage to the access regime. We also discussed alternative providers who offer discounted rates but cannot meet these minimum standards.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ Brian J. Benison

cc: William Dever Carol Simpson
Richard Hovey Steve Rowings
Chris Killion Terry Cavanaugh
Margaret Dailey Theodore Marcus
John Healy